

DESOUZA LAW OFFICES, a professional corporation
JACQUELINE DESOUZA, State Bar No.:133686
PAMELA F. ELLMAN, State Bar No.:164574
2397 Shattuck Avenue, Suite 202
Berkeley, CA 94704
Telephone: (510) 649-3420
Facsimile: (510) 649-1711

Attorneys for Defendant(s):
RWS ENTERPRISES WHICH WILL DO BUSINESS
IN CALIFORNIA AS KIDDIE KANDIDS, INC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JACQUELYN HARRIS, LORA MOTE, and
COURTNEY COLIANNA, on behalf of
themselves and all others similarly situated,

Plaintiffs,

vs.

RWS ENTERPRISES WHICH WILL DO
BUSINESS IN CALIFORNIA AS KIDDIE
KANDIDS, INC, and DOES 1 through 50,
inclusive,

Defendants.

Case No. C 08-00852 PJH

**STIPULATION OF THE PARTIES AND
[PROPOSED] ORDER CONTINUING
PLAINTIFFS' MOTION TO REMAND
TO ALLOW THE PARTIES TO
ENGAGE IN SETTLEMENT
DISCUSSIONS**

Complaint Filed: January 4, 2008

Pursuant to Northern District Local Rules, rule 6.2 and 7.12, the parties, by their attorneys of record, stipulate to continue Plaintiffs' Motion to Remand this Action to State Court for 30 days in order to exchange information and engage in settlement discussions. The parties request that Plaintiffs' Motion to Remand presently set for April 2, 2008, be continued to May 7, 2008. The parties further request that the deadlines for filing Defendant's opposition and Plaintiffs' reply papers be calculated, in accordance with Federal Rules of Civil Procedure, from the May 9th hearing date.

Neither party has previously requested a continuance of this Court.

The Court has scheduled an initial Case Management Conference for May 15, 2008. The parties will comply with the Federal Rules of Civil Procedure, rule 26 subdivision (f) and Standing Order For All Judges Of The Northern District and do not request a continuance of the May 15th Case Management Conference.

IT IS SO STIPULATED:

DATED: March 5, 2008 March 6, 2008

DESOUZA LAW OFFICES
a professional corporation

By: /s/ Jacqueline deSouza
Jacqueline deSouza
Attorneys for Defendant
RWS ENTERPRISES WHICH WILL DO
BUSINESS IN CALIFORNIA AS KIDDIE
KANDIDS, INC.

DATED: March 5, 2008

LAW OFFICES OF RANDALL CRANE

By: /s/ Randall Crane
Randall Crane
Attorneys for Plaintiffs
JACQUELYN HARRIS, LORA MOTE, and
COURTNEY COLIANNA, on behalf of
themselves and all others similarly situated.

Good Cause Appearing, this Court GRANTS the parties' request for a continuance of Plaintiffs' Motion to Remand for 30 days. The Plaintiffs' Motion shall be heard on May 7, 2008, at 9:00 am in Department 17 of this Court. Defendant's opposition and Plaintiffs' reply shall be

///

1 calendared from the May 9th hearing date in accordance with the Federal Rules of Civil Procedure.

2 IT IS SO ORDERED:

3
4 DATED: March __, 2008

By: _____
The Hon. Phyllis J. Hamilton
Judge of the United States District Court
Northern District of California